

## REP7-042 9.46 Applicant Response to D6 Submissions (Rev 1)

### D6R29 Air Quality and Emissions Response

The Applicant responded to a question from Newark and Sherwood District Council listed under D6R29 with:

*In accordance with the Department for Environment, Food & Rural Affairs' Local Air Quality Management Technical Guidance (TG22, May 2025) and the requirements of National Policy Statements EN-01 and EN-03, the assessment of emissions from unplanned fires associated with the Battery Energy Storage System (BESS) focuses on potential risks to human health, safety, and designated ecological sites, including protected species and habitats. On this basis, the three commercial poultry farm operations in the vicinity are not considered sensitive receptors under the relevant guidance.*

In Department for Environment, Food & Rural Affairs' Local Air Quality Management Technical Guidance (TG22, May 2025), which The Applicant referenced in D6R29, a Relevant Receptor is defined as:

Relevant Receptor	A location representative of human (or ecological) exposure to a pollutant, over a time period relevant to the objective that is being assessed against, where the Air Quality Strategy objectives are considered to apply
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Whilst EN-01 refers to a sensitive receptor such as education or healthcare sites, residential use or sensitive or protected ecosystems, the policy does not state it is limited to only these.

In REP6-056 9.42 Applicant Response to Deadline 5 Submissions (Rev 1) The Applicant also responded to my submission under D5R40 and stated “2. Sensitive receptors: *Under the assessment methodology, “sensitive receptors” are locations relevant for human health – predominantly residential properties. Farm buildings and water treatment facilities are not classified as sensitive receptors for the purposes of air quality and health risk assessment.*”

Within this response I would highlight the text “*Under the assessment methodology, “sensitive receptors” are locations relevant for human health – predominantly residential properties.*” The wording of the statement from The Applicant says the sensitive receptor is a location relevant to human health, this surely must include places of work and probably also PROW where members of the population could be found on a regular

basis. I would therefore respectfully challenge the Applicants statement that a Poultry Farm does not fall within the definition of a “receptor”, especially when a Poultry Farm is a place of work and therefore have human beings working within this area. The sheds are also required to be accessible 24/7 and at times can have numerous workers on site. There will also be workers at the water treatment plant.

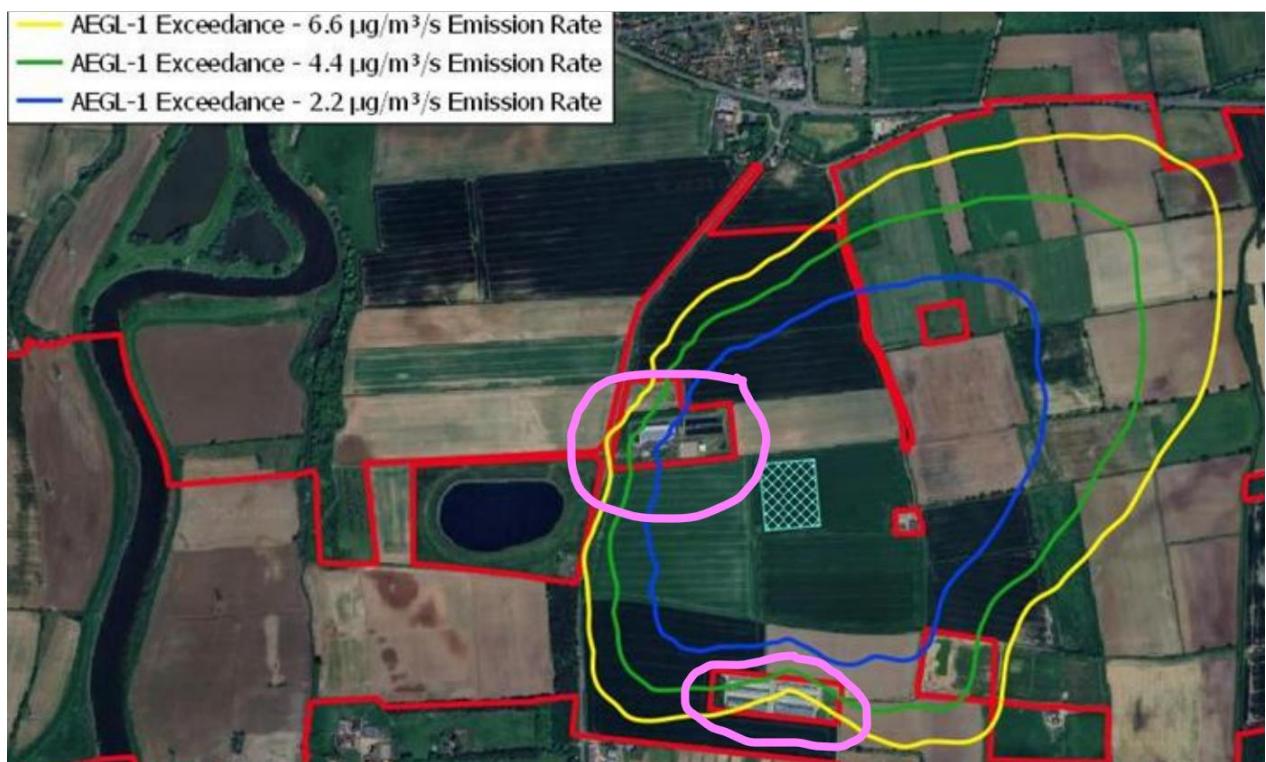
Even if the Poultry Sheds and Water Treatment Plant are not deemed to be a sensitive receptor, which I would disagree with given the above information, there is a residential dwelling at Northfield Farm and therefore I would still challenge the accuracy of REP7-022 7.11.6 Outline Battery Safety Management Plan (Clean) (Rev 7), C.4.4.1 where it states “no sensitive receptors” in relation to unplanned emissions at the Eastern BESS Site as there is at least one which meets the definitions the Applicants have provided as evidence to back their suggestion there isn’t any.

Whilst the Applicant is applying the statement within NPS EN-01 and information from within TG22 about a receptor to the modelling undertaken, it is interesting to note what the Environmental Agency (EA) refers to when identifying receptors when undertaking a risk assessment. The EA list several receptors which should be identified that may be at risk and these include but are not limited to the following:

- Protected sites
- Anywhere used to grow food or to farm animals
- Factories and other businesses
- Footpaths
- Groundwater beneath the site
- Homes

I have included some pictures of the site areas in question.

Below is Figure C.2: Impacts from Unplanned Emissions at Eastern BESS Compound from the oBSMP. I have highlighted the Anglian Water, Water Treatment Plant and Northfield Farm and Bungalow in pink.



Northfield Poultry Sheds and Residential Property, highlighted by the pink circles.



Clearer image of the Anglian Water, Water Treatment Plant.



### **Incorrect Reference Used**

Also C.4.4.3. within REP7-022 refers to PHE, however on the 1<sup>st</sup> October 2021, Public Health England (PHE) ceased to exist and was replaced by the UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities. Therefore, this reference is incorrect.